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"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

February 5, 2015

via ECF

Honorable Judge Richard M. Berman
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Irving Firemen's Relief and Retirement Fund v. Tesco PLC, et al.*, No. 14-cv-08495

Dear Judge Berman,

On February 2, 2015, Your Honor submitted a Memo Endorsement (ECF No. 40) on the docket of the above-captioned action allowing Sheet Metal Workers' National Pension Fund ("National Pension Fund") to respond, by February 4, 2015 at noon, to the opposition letter filed by movant Stephen Klug ("Klug") on January 9, 2015, regarding competing motions for appointment of lead plaintiff (ECR No. 44). Klug's letter claimed that a few of National Pension Fund's numerous Tesco PLC transactions contained "discrepancies." To confirm, National Pension Fund chose not to respond to Klug's letter because National Pension Fund's memorandum of law in further support of its lead plaintiff motion, and accompanying bank statement trade confirmations submitted as an exhibit to the memorandum, filed on January 9, 2015, had already fully addressed and disproved any purported discrepancies regarding those transactions. *See* ECF Nos. 40, 41-1; 15 U.S.C. § 78u-4(a)(3)(b)(iii)(I) (stating only upon **proof** that a movant will not fairly or adequately protect the interest of the class, or is subject to unique defenses, may the presumption in favor of the presumptive lead plaintiff be rebutted). Accordingly, we respectfully submit that this Court should consolidate all related actions, appoint National Pension Fund as Lead Plaintiff, and approve National Pension Fund's selection of counsel to serve as Lead Counsel.

Sincerely,

Rebecca M. Katz

cc: All Counsel of record via ECF